



# Understanding the Audit Process

October 23, 2024

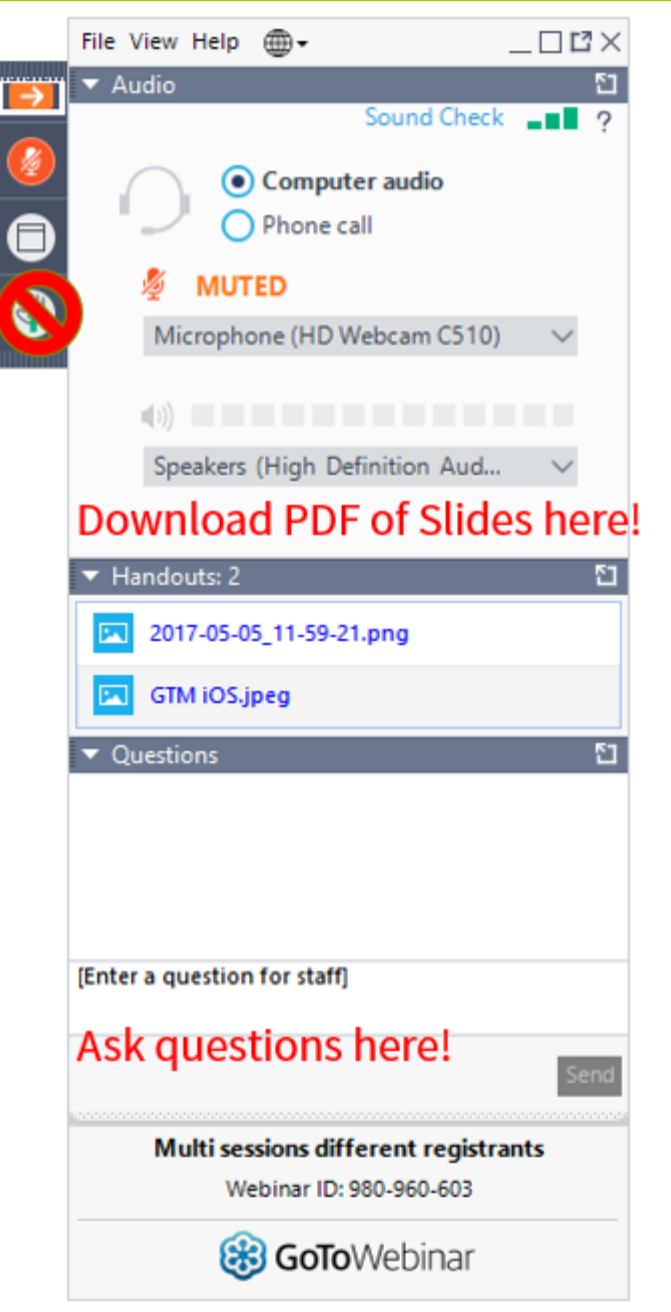
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# Meet the RHC Team



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# Meet the Audit Team



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# Agenda

- Introduction to Audit and Assurance Division (AAD)
- Payment Quality Assurance (PQA)
- Supply Chain Audit Program (SCAP)
- Beneficiary and Contributor Audit Program (BCAP)
- Planning
- Fieldwork
- Sufficient Documentation
- Avoiding Pitfalls for Common Audit Findings
- Reporting
- Best Practices and Resources

# Glossary

<b>Acronym</b>	<b>Definition</b>
FCC	Federal Communications Commission
FY	Funding Year
HCP	Health Care Provider (your site)
HCP Number	Number associated with your site or consortium
PAH	Primary Account Holder
PQA	Payment Quality Assurance
PIIA	Payment Integrity Information Act of 2019
BCAP	Beneficiary and Contributor Audit Program
SCAP	Supply Chain Audit Program
GAGAS	Generally Accepted Government Auditing Standards

# **Introduction to Audit and Assurance Division (AAD)**

Understanding the Audit Process



# Beneficiary - Definition

- For the purposes of Audit, health care providers (HCPs) are referred to as beneficiaries.
  - These terms are interchangeable and will be used where relevant in this presentation.
- Service providers are considered contributors but for the purposes of Audit, they are still referred to as service providers.

# Authoritative Guidance

- “Collaborating with the Office of Managing Director, USAC will implement a comprehensive program to audit USF programs and identify and recover improper payments...” *Memorandum of Understanding Between the Federal Communications Commission and the Universal Service Administrative Company, Part 4, Section G.*

## Authoritative Guidance (continued)

- “Beneficiary and Contributor Audits. USAC or any independent auditor that USAC engages shall conduct audits in accordance with generally accepted government auditing standards (GAGAS), as required by 47 CFR §54.702(n). The cost-effective audit program shall be designed to recapture improperly disbursed payments, to determine whether USF monies are used for their intended purpose, to verify that all audited USF contributors are making the appropriate contributions in accordance with the Commission’s rules, and to detect and deter waste, fraud, and abuse.” *Memorandum of Understanding Between the Federal Communications Commission and the Universal Service Administrative Company, Part 4, Section G.*

## Authoritative Guidance (continued)

- Supply Chain Audit Program: In the National Security Supply Chain Order, FCC 19-121, rel. Nov. 26, 2019 (“First Report and Order”), the FCC directed USAC to implement audit procedures consistent with the adopted rules.

# Audit and Assurance Division (AAD) Overview

- BCAP (Beneficiary and Contributor Audit Program)
  - Designed to assess compliance with FCC rules and safeguard the Universal Service Fund via performance audits or agreed-upon procedure reviews.
  - Performed by internal USAC staff or outside audit firms.
- PQA (Payment Quality Assurance) Program
  - Designed to assess estimated rates of improper payments via assessments, not audits.
  - Provide the FCC with information about improper payments to program beneficiaries, as required by the Payment Integrity Information Act of 2019 (PIIA).
- SCAP (Supply Chain Audit Program)
  - Designed to assess compliance with Federal Communications Commission (FCC) rules, orders, and program requirements (FCC Rules) related to protecting the communications supply chain.
- Contact AAD's team via email to [auditinquiry@usac.org](mailto:auditinquiry@usac.org).

**Note:** USAC also performs program integrity assurance (PIA) reviews (not audits or assessments).

## AAD Overview (continued)

PQA	SCAP	BCAP
Determines improper payment rates for the FCC in accordance with PIIA.	Assesses compliance with FCC Rules as it relates to the Supply Chain.	Assesses compliance with FCC Rules.
Evaluates accuracy of data submitted for USF purposes (a high-level review) <b>and</b> USAC (internal) disbursement processes.	Evaluates whether USF recipients have used USF funds and federal subsidies to purchase any equipment or services provided or manufactured by Covered List Companies.	Evaluates accuracy of data submitted for USF purposes (a detailed review).
Identifies overpayments that must be recaptured.	AAD will work with the FCC to determine what corrective action is appropriate.	Identifies correct contribution obligations (for contributor audits)/overpayments that must be recaptured (for beneficiary audits).
Initiates other corrective actions to decrease improper payment rates.	Initiates other corrective actions to increase compliance rates.	Initiates other corrective actions to increase compliance rates.
Deters waste, fraud and abuse.		
Identifies FCC Rules that may require the attention of USAC or FCC management.		

# **Payment Quality Assurance (PQA) - Assessment**

Understanding the Audit Process

# Payment Quality Assurance (PQA)

## Assessment Facts:

- The PQA program enables USAC to provide the FCC with information about improper payments to program beneficiaries, as required by the Payment Integrity Information Act of 2019 (PIIA).
- PIIA requires federal agencies to review the programs and activities they administer and identify those that may be susceptible to significant improper payments.



# Payment Quality Assurance (PQA) (continued)

## Assessment Facts:

- As defined in 31 U.S.C. § 3321 note, the term "improper payment":
  - A) means any payment that should not have been made or that was made in an incorrect amount (including overpayments and underpayments) under statutory, contractual, administrative, or other legally applicable requirements; and
  - (B) includes any payment to an ineligible recipient, any payment for an ineligible good or service, any duplicate payment, any payment for a good or service not received (except for such payments where authorized by law), and any payment that does not account for credit for applicable discounts.

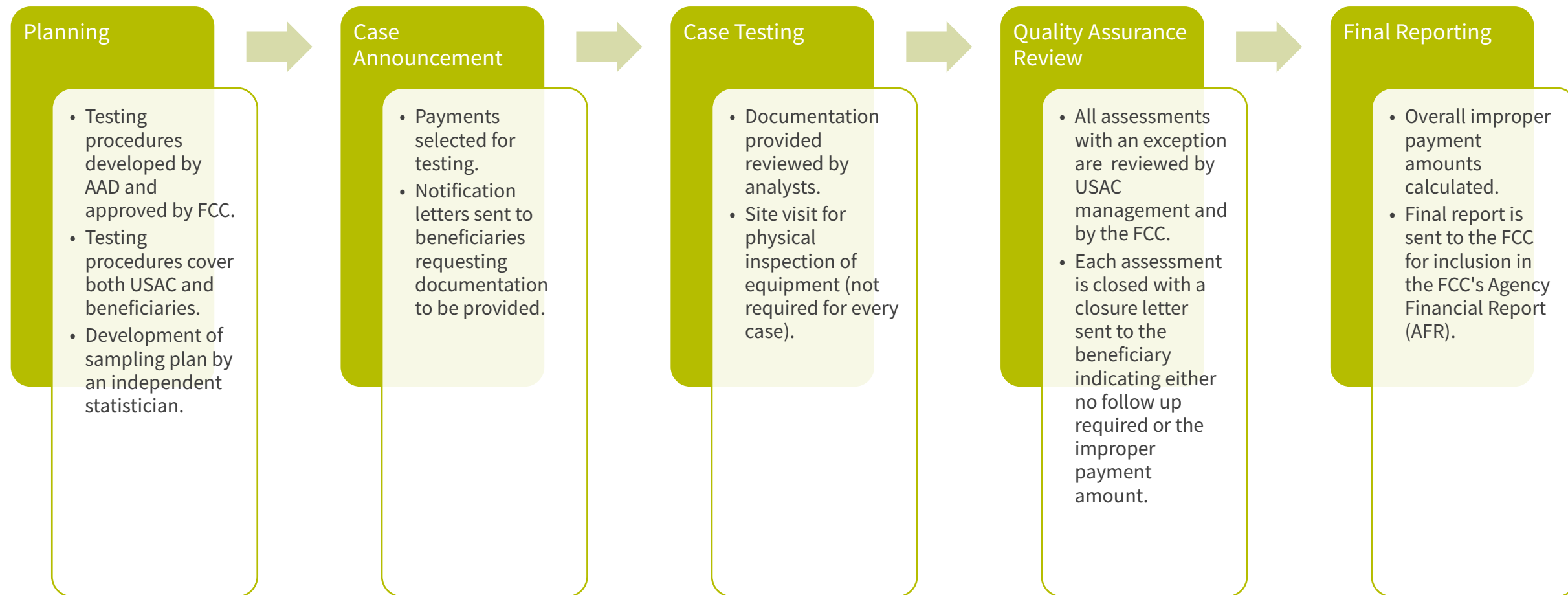
# Payment Quality Assurance (PQA) (continued)

## Assessment Facts:

- Under the PQA program, USAC assesses specific payments made to select beneficiaries to determine if these payments were made in accordance with FCC rules.
- Using results of these assessments, USAC calculates estimates of improper payment rates and provides this information to the FCC to be included in the FCC's Agency Financial Report (AFR).
- PQA assessments are completed each fiscal year (October 1 through September 30).
- A number of Program disbursements, or cases, are selected each year for review.
- An independent statistician selects a statistical sample of current year disbursements in accordance with PIIA.

# Payment Quality Assurance (PQA) - Process

- What is the Process?



# **Supply Chain Audit Program (SCAP)**

Understanding the Audit Process

# Supply Chain Audit Program (SCAP)

- As part of the new requirements, the FCC in National Security Supply Chain Order, FCC 19-121, rel. Nov. 26, 2019, directed USAC to implement audit procedures consistent with the adopted rules.
- Effective January 3, 2020, [47 C.F.R. § 54.9](#) states, “No universal service support may be used to purchase, obtain, maintain, improve, modify, or otherwise support any equipment or services produced or provided by any company posing a national security threat to the integrity of communications networks or the communications supply chain.”

# Supply Chain Audit Program (SCAP)

- To determine compliance, USAC's audit objective will be to evaluate whether program participants have used USF funds and federal subsidies to purchase, obtain, maintain, improve, modify, or otherwise support, rent, lease or obtain any equipment or services provided or manufactured by Covered Companies or any of their parents, affiliates or subsidiaries.
- In its role as the auditor, USAC is responsible for determining compliance with the Supply Chain Order, as indicated by the certifications made by USF recipients.
- USAC works closely with the FCC to minimize audit-related issues and ensure a smooth process.

# Supply Chain Audit Program (SCAP)

- USF recipients are required to affirmatively demonstrate that no Universal Service funds were used to purchase, obtain, maintain, improve, modify, or otherwise support any equipment or services provided or manufactured by Covered Companies or any of their parents, affiliates, or subsidiaries.
- Audits are performed in accordance with GAGAS, following a 3-phase process.

**Questions?**



# **Beneficiary & Contributor Audit Program (BCAP)**

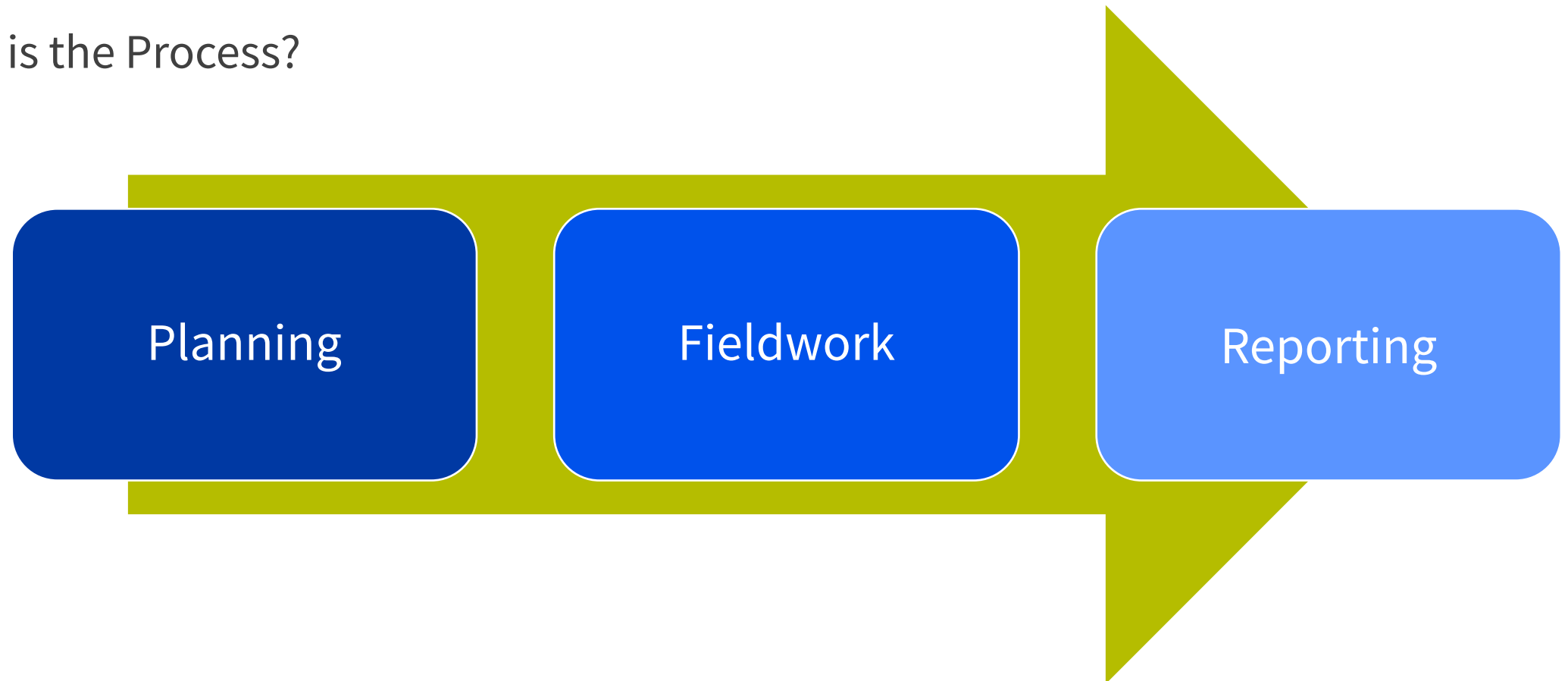
Understanding the Audit Process

# Beneficiary & Contributor Audit Program (BCAP)

- The Beneficiary and Contributor Audit Program (BCAP) is designed to measure rates of program compliance among Universal Service beneficiaries and contributors.
- Assess compliance with FCC rules and safeguard the USF via performance audits.
- Audit plans are developed annually. Current plan starting in October 2024 will cover audits of FY2022 and/or 2023.
- Most audits are “limited reviews” that place a heavier focus on the FCC Rules with a history of non-compliance.

# BCAP Audits – Audit Process

- What is the Process?



# BCAP Audits – Audit Process (cont'd)

## Planning

- Announcement letter
- Entrance conference
- Documentation requests
  - Documentation for Auditors Checklist available on the USAC website:
    - <https://www.usac.org/wp-content/uploads/about/documents/pdf/audit/Rural-Health-Care-Audit-Checklist.pdf>

## BCAP Audits – Audit Process (cont'd)

### Fieldwork

- Documentation Review
- Perform audit procedures
- Document conclusions
- Site Visit, as applicable
- Quality Assurance Review

# BCAP Audits – Audit Process (cont'd)

## Reporting

- Draft Audit Findings
- USAC and FCC Reviews
- Exit Conference
- Responses to audit findings and other matters
- Finalize Audit Report

# BCAP RHC Audit Process

- Funding Year is selected for audit.
- HCF Program Audit Areas:
  - Network Plans, FCC Forms 461/462, Competitive Bidding, Eligibility (Entity/Use), Site or Service Substitutions, Invoicing, Excess Capacity and Fair Share
- Telecom Program Audit Areas:
  - FCC Forms 465/466, Competitive Bidding, Rural and Urban Rates, Network Design, Service Provider Bills, Invoicing, Site or Service Substitutions
- Correspond with both beneficiaries and service providers for HCF and Telecom audits.

## BCAP RHC Audit Process (continued)

- AAD helps improve applicants' compliance with program rules success by analyzing results and accumulating common audit findings.
  - Common audit findings are shared with the Rural Health Care (RHC) program so that action plans for ensuring applicant success can be developed.
  - Audits look for the root causes of non-compliance so that RHC program outreach efforts can address the cause rather than just the result.



**Questions?**

# Planning

## Understanding the Audit Process

# You Have Been Selected for an Audit... Now What?

## Beneficiaries – HCF Program:

- The audit team will call to announce the audit.
  - Call is made to the Primary Account Holder (PAH) or Project Coordinator for a consortium.
  - Be sure information on the FCC Form 460 is kept current.
- An audit announcement package will be uploaded to a folder on Box (USAC's file transfer tool) and the PAH will be notified so that it can be retrieved. The audit announcement package will include:
  - A request for information (two-week turnaround);
  - An internal control questionnaire; and
  - A process interview questionnaire.
- The audit team will schedule an entrance conference.

## Beneficiaries – Telecom Program:

- The audit team will call to announce the audit.
  - Call is made to the Primary Account Holder (PAH) or Project Coordinator for a consortium.
  - Be sure information on the FCC Form 460/465 is kept current.
- An audit announcement letter will be uploaded to a folder on Box (USAC's file transfer tool) and the PAH will be notified so that it can be retrieved. The audit announcement letter will include:
  - A request for information (two-week turnaround); and
  - A process interview questionnaire.
- The audit team will schedule an entrance conference.

# You Have Been Selected for an Audit... Now What?

## Service Providers – HCF Program:

- The audit team will notify the service provider(s) about the audit via an announcement letter uploaded to a folder on Box (USAC's file transfer tool).
  - Contact information on the FCC Form 498 will be used.
  - Be sure this information is kept up to date and current.
- The auditors routinely request assistance from service providers to help lessen the burden on the beneficiaries.

## Service Providers – Telecom Program:

- The audit team will call to announce the audit.
  - Contact information on the FCC Form 498 will be used.
  - Be sure this information is kept up to date and current.
- An audit announcement package will be uploaded to a folder on Box (USAC's file transfer tool) and the primary contact will be notified so that it can be retrieved. The audit announcement package will include:
  - A request for information (two-week turnaround);
  - An internal control questionnaire; and
  - A process interview questionnaire.
- The audit team will schedule an entrance conference.

# Requests for Documentation

- The auditors obtain all FCC Forms from RHC that were approved in the relevant funding year(s).
- The list of documents requested from the beneficiaries/service providers include items needed to demonstrate compliance with FCC rules that may not be obtained or maintained by RHC.
  - See examples in the Sufficient Documentation section of this slide deck.
- Per RHC program rules, HCPs and service providers are required to retain documentation for a minimum of five years after the last day of the delivery of supported services, equipment, or facilities in a particular funding year.

# Fieldwork - Overview

Understanding the Audit Process

# Fieldwork

- Audits are required to be performed in accordance with Generally Accepted Government Auditing Standards (GAGAS) per 47 C.F.R. § 54.702(n).
- GAGAS requires auditors to obtain sufficient, appropriate evidence to provide a reasonable basis supporting their findings and conclusions.
  - Government Auditing Standards, GAO-18-568G Section 8.90 (2018 Revision as amended).

# Understanding the Audited Entity Processes

- GAGAS requires the auditors to obtain an understanding of the beneficiary's and service provider's processes.
- Auditors may modify audit procedures based on the auditors' assessment of entity processes.
- Auditors examine the beneficiary's and service provider's responses to the internal control questionnaire and process interview questionnaire provided with the announcement package.
- Auditors conduct additional process inquiries, as necessary.



# Site Visits

- Site visits are performed as part of the fieldwork testing.
- A site visit usually takes two to five business days.
  - Most of the testing is performed in USAC's offices.
- If a site visit is necessary, the HCP will be notified as soon as possible.
- The auditor will coordinate with the HCP on the timing and location(s) to be visited.

# Purpose of the Site Visits

- Discuss questions developed during review of documentation provided.
- Obtain additional documentation, if necessary.
- Perform a physical inventory of equipment.
- Determine whether beneficiary has equipment to make effective use of RHC supported services.
- Understand how services are used.

# Sampling

- The auditor may select samples of documentation to be provided.
- Documentation may include:
  - Service provider bills, including proof of payment, etc.
  - Equipment documentation.
    - Auditor may also select a sample of equipment to inventory.
  - For consortia, a sample of the consortium's members to ensure member compliance.

# Fieldwork - Sufficient Documentation

Understanding the Audit Process

# What is Sufficient Documentation?

- The following slides provide examples of documentation examined during an audit.
  - The examples are not all-inclusive.
- Additional documentation may be requested throughout the audit process.

# Requests for Services – Funding Requests

- Requests for Proposals.
- Copies of bids received (winning, losing, and disqualified).
- Documentation supporting the selection of the service provider.
  - Individual evaluation score sheets, summary score sheets, bid meeting notes, meeting sign-in sheets, etc. (as applicable).
  - This documentation demonstrates that the selected service provider was the most cost-effective.
- Correspondence with potential bidders (if any) and their consultants.
- Copies of contracts for FRNs under audit.
- Copies of all services contracts/agreements with consultants, or channel partners, if applicable.

# Rural and Urban Rates – Telecom Program

- Examples of supporting documentation include:
  - Rural Rates:
    - Narrative describing what method was chosen and why (Method 1, 2 or 3).
      - HCPs must explain why they could not use Method 1 before moving to Method 2.
      - Before moving to Method 3, an explanation is needed why Method 2 could not be used.
    - Detailed math/instructions used to calculate the rural rate, including search parameters for Method 1 commercial customer list, or Method 2 Open Data use.
    - Other source documents depending on calculation method used (such as evidence of rates being charged to commercial customers, tariffs, evidence that rate were sent to commission for approval, etc.).
    - Where applicable, documentation showing previously approved rate substantiating rural rate.
  - Urban Rate: Evidence of tariffed or publicly available rates, including search parameters, to support the urban rate; where applicable, documentation showing previously approved rate substantiating urban rate.

# Eligibility of HCPs

- Auditors review documentation to determine whether:
  - All ineligible sites are paying their fair share of expenses, including cost allocation methodology and inputs.
  - The recipient of funding is one of the eligible entity types specified in the FCC rules.
  - Site is in a rural area, or (for consortia) that more than 50% of eligible member HCP sites are in rural areas.
  - HCP sites were open and provisioning healthcare during the timeframe in the funding commitment.



# Equipment – HCF Program

- All HCF funded equipment.
  - Must include the model, installation date, and location of the equipment, and
  - If equipment has been uninstalled or removed, documentation demonstrating why and current location.
  - Contract or service orders, including the list of equipment to be maintained with RHC funds.

# Equipment and Services – HCF Program

- Description of how the services and equipment are being utilized for the in-scope FRNs.
- Evidence must include the model, installation date, and location of the equipment.
- If equipment has been uninstalled or removed, documentation demonstrating why and current location.
- Documentation demonstrating the oversight and ownership of the HCF project, including who owns the funded equipment.
- Description of the usage of equipment and services used at any locations delivering healthcare on a part-time basis.

# Equipment and Services – HCF Program (continued)

- Network diagram of all circuit connections to and from the HCP(s), including identification of any funded equipment within the diagram.
- Explanations for the use of any excess capacity constructed or purchased through IRUs or leases.
- Monthly circuit utilization reports, data usage reports, network traffic reports and/or ping reports portraying bandwidth utilization.
- Documentation demonstrating how costs are allocated between eligible and ineligible equipment/services.

# Services – Telecom Program

- Description of how the services are being utilized for the in-scope FRNs.
- Description of the usage of services used at any locations delivering healthcare on a part-time basis.
- Maps, Network diagram, etc. of all circuit connections to and from the HCP(s) that demonstrate the design of the HCP(s) network.
- Monthly circuit utilization reports, data usage reports, network traffic reports and/or ping reports portraying bandwidth utilization.
- Call detailed records (for any funded voice services).
- Documentation demonstrating how costs are allocated between eligible and ineligible equipment/services.

# Services Received – HCF and Telecom Program

- Copies of service provider bills.
- Proof that the HCP's undiscounted share has been paid.
  - Examples - Cancelled checks, bank statements, accounts payable history
- Reconciliation between the eligible services billed and the services invoiced to RHC.
- Documentation demonstrating the reimbursement or credit for the funded services from the service provider has been received.

**Questions?**

# **Common Audit Findings**

## Understanding the Audit Process

# Common Audit Findings - Overview

- Inaccurate or inadequate rate determination (urban and rural rate).
- Invoicing errors
- Support not used for the provision of healthcare services
- Ineligible sites, services, or equipment
- Ineligible equipment (HCF)
- Inadequate competitive bidding process
- Using funds to purchase, obtain, or otherwise support any equipment or services provided or manufactured by companies on the FCC's Covered List.
- Lack of document retention.



# Rural Rate and Urban Rates (Telecom Program)

- Rural or urban rate is not calculated correctly per FCC rules ([DA 21-394](#) and [DA 23-6](#)).
- A person who is familiar with the FCC Rules for rate determination should perform a review to determine whether the rates were determined in accordance with the FCC rules.
- Note: Additional information on the calculation of rural and urban rates can be found using the tip sheets on the USAC website:
  - [Telecom Program: Urban and Rural Rates](#) for FY2021-2022
  - [Urban and Rural Rate Information FY2024-FY2025](#)
- Ensure that each rural rate method is considered sequentially first (i.e., Method 1, then Method 2, then Method 3).
- Maintain thorough documentation to support why the previous rural rate method could not be used.
- When using public tariffs or other publicly available information, ensure the tariff/document is marked to identify which rates are used in the calculation and why.

# Invoicing Errors (HCF and Telecom Programs)

- RHC program is invoiced for ineligible sites/locations.
  - Ensure that eligible and ineligible locations are cost-allocated by the HCP and the service provider.
- Actual cost is in excess of a service provider bill.
  - Ensure all invoices submitted to RHC program reconcile to the service provider bills.
- Services and equipment are not rendered.
  - Ensure services invoiced are for actual services delivered and rendered in use, rather than quoted services.

# Invoicing Errors (HCF and Telecom Programs) continued

- RHC Program is invoiced for services to ineligible locations not on the FCC Form 462 or 466.
  - Ensure that eligible and ineligible locations are cost-allocated by the HCP and service provider.
  - Ineligible locations include the following scenarios:
    - Entities included in the service provider bills were not included on the approved FCC Form 462 or 466.
    - Services were provided to sites that were not approved on FCC Form 462 or 466.
  - Failure to cost-allocate may result in ineligible amounts being invoiced to the RHC program.

# Support Not Used for Health Care (HCF and Telecom Programs)

- Support must be reasonably related to the provision of health care services or instruction that the HCP is legally authorized to provide.
  - For instruction (i.e., post-secondary education facilities) that offers healthcare and non-healthcare related offerings, ensure cost allocation documentation is retained, along with any supplemental documentation.
- Information submitted on all FCC Forms, RFP (if applicable), sustainability plan (if applicable), and service provider bills must support the use of the supported services for the provision of health care services or instruction.
- Maintain monthly circuit utilization reports, data usage reports, network traffic reports and/or ping reports portraying bandwidth utilization.
- Maintain call detailed records and/or logs (for any funded voice services).

# Ineligible Services or Equipment (HCF and Telecom Programs)

- Ensure that eligible and ineligible products and services delivered and identified are cost-allocated by the HCP and the service provider.
  - Examples of ineligible charges may include:
    - Voice features (HCF Program)
    - End user equipment
    - Bundled services that may not be eligible in the Telecom or HCF Program
    - Administrative fees
- Maintain reconciliations between the service provider bills and expenses/rates listed on the FCC Form 462 and 466.
- Services invoiced must have been requested in the FCC Form 461 or 465 or approved as a site and service substitution.

# Ineligible Equipment (HCF Program)

- Equipment must make functional a service that's supported under the HCF Program.
  - Equipment that sits on a shelf as unused or as a spare is not eligible for funding.
- Demonstrate necessary equipment was purchased and installed in the funding year in which it was requested.
- Ensure connections and equipment have been installed at the specified locations.

# Inadequate Competitive Bidding Process (HCF and Telecom Programs)

- Ensure that the selected service was requested on the FCC Form 461 or 465 and RFP (if applicable).
  - Do not stray away from the evaluation criteria published in the FCC Form 461 or 465 and RFP (if applicable).
- HCPs must demonstrate that cost was given a primary weight for eligible services and was evaluated as such.
- Ensure bids are scored properly on the evaluation matrix.
- Ensure documentation clearly demonstrates disqualified bids did not meet the requirements of the services requested.
- Competitive bidding findings often result in full recovery of funds disbursed and/or downward commitment adjustments to the associated FRN(s) to \$0.

# Equipment/Services on the FCC Covered List (SCAP Audits)

- USF recipients must maintain and retain documentation to affirmatively demonstrate compliance with FCC rules.
- Applicants are prohibited from receiving services provided by companies on the FCC's [Covered List](#)
- Relevant documentation includes:
  - Telecommunication asset listing
  - USF expenditure details
  - Details of transactions with providers of telecom equipment and services
  - Bookkeeping and other financial records to verify the flow of USF funds



# Document Retention (HCF and Telecom Program)

- Maintain records to document compliance with program rules and orders for at least five years after the last day of service delivered in a particular funding year. Examples of such documentation include:
  - Bids, contracts, scoring matrices, and other information associated with the competitive bidding process
  - Billing records for services received.
  - Telecommunications Program: Records of allocations for consortia and entities that engage in eligible and ineligible activities
    - Mobile rural healthcare providers: Annual logs indicating the date and locations of each clinical stop, and the number of patients served at each clinical stop.
  - HCF Program: Asset and inventory records of supported network equipment to verify the actual location of such equipment for a period of five years after purchase.

**Questions?**

# Reporting

## Understanding the Audit Process

# Reporting

- A “finding” is a condition that shows evidence of noncompliance with FCC rules and RHC requirements.
- An “other matter” is a condition that does not necessarily constitute a rule violation but warrants the attention of the HCP, RHC, and FCC management.
- An exit conference is conducted to discuss the audit results and any findings or other matters.
- Findings and other matters will be communicated throughout the audit as they arise.

# Audit Findings

- All draft audit findings are reviewed by AAD management and the FCC before they are sent to the beneficiary and/or service provider, as necessary, based on the nature of the finding.
- All draft audit findings are provided to the beneficiary and service provider, if necessary, to obtain a written response.
- All draft audit findings are provided to RHC, with the beneficiary's and/or service provider's response, as applicable, to obtain a written response.
- RHC seeks recovery and/or takes other corrective action after delivery of the final audit report to the beneficiary and/or service provider.

# Audit Reports

- The quality assurance review process takes approximately two months.
- The auditors may be asked by the quality assurance reviewers for additional information, which may require the auditors to conduct follow-up with the beneficiary and/or the service provider.
- When the review process is complete, the beneficiary and/or the service provider will receive the audit report, which contains all findings and other matters with the RHC program responses.

## Audit Reports (continued)

- If RHC seeks recovery of funds, RHC will send a Commitment Adjustment (COMAD), or a Recovery of the Improperly Disbursed Funds (RIDF) letter.
  - The beneficiary or service provider has a right to appeal the COMAD or RIDF.
    - Appeal must be filed within 60 days from the date of the COMAD or RIDF notice.
- Once the final audit report is delivered, AAD is not involved in the corrective action.
  - AAD must maintain its independence from management decisions.

# What Can an HCP or Service Provider do to Ensure Success?

- Provide complete documentation.
  - Use RHC Connect and My Portal for documentation.
    - Do not rely solely on RHC Connect and My Portal.
    - HCP is ultimately responsible for providing all documentation.
  - If the HCP does not believe complete documentation is available, inform the auditor immediately so that alternative procedures can be discussed.
- Seek assistance from service providers or HCPs.
  - AAD notifies both service providers and HCPs of the audit.
- Respond to audit requests in a timely manner.
- Ensure the individuals with the appropriate knowledge are available.



# **Best Practices and Resources**

## Understanding the Audit Process

# Post-Audit Survey

- Questions are asked to:
  - Solicit information to improve the audit process.
  - Solicit information about auditor professionalism.
  - Request feedback on suggestions to smooth audit burden and to improve communications.
  - Ask questions about USAC outreach efforts.
- Survey results are compiled and shared with USAC Executive Leadership and Board of Directors.

# Additional Resources

- [Appeals & Audits](#) webpage
- [PQA Program](#) webpage
- [BCAP](#) webpage
- [Common Audit Findings: Rural Health Care Program](#) webpage
- Telecom Program: Urban and Rural Rates for FY2021-2022 tip sheet
- [Urban and Rural Rate Information FY2024-2025](#) tip sheet
- [List of Common Products and Services HCF](#) tip sheet
- [List of Common Products and Services Telecom](#) tip sheet

# Questions? - Contact Audit



Email: [auditingquiry@usac.org](mailto:auditingquiry@usac.org)

- Include in your email:
  - Audit ID [**RH20XXSPXXX** or **RH20XXLRXXX**] or
  - PQA case number [**RHC-YEAR-XX-Case-XX**]

# RHC Program Customer Service Center



Email: [RHC-Assist@usac.org](mailto:RHC-Assist@usac.org)

- Include in your email:
  - HCP Number
  - FRN Number



- Phone: **(800) 453-1546**
  - Hours are 8 a.m. – 8 p.m. ET
  - Monday- Friday

**Please Note:** The RHC Program Customer Service Center is available to help with general RHC questions. Any requests for information from auditors must be responded to directly to those emails.

**Questions?**

**Thank You!**





**Universal Service**  
Administrative Co.